



MINERAL COUNTY BOARD OF COMMISSIONERS

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November 1, 2010

ATTN: Final EIS/HCP
Montana DNRC
2705 Spurgin Road
Missoula, MT 59804-3139

RE: Final EIS – Habitat Conservation Plan

Dear DNRC and USFWS Project Managers:

Thank you; once again, for the opportunity to review the final version of your Habitat Conservation Plan covering our state's forested Trust Lands (and thank you for the review period extension). As we mentioned in our earlier comments on the Draft EIS, we remain appreciative of the huge effort it must have taken to achieve management direction that reflects agreement between two agencies whose separate missions are so different.

Our former comments, which you should note as continuing comments on the Final EIS, reflected our concern for sustainable development and habitat conservation on all lands within our borders, with state lands becoming an ever more important resource as federal lands languish in their traditional role of providing economic opportunities. This HCP appears poised to reduce delays and litigation that might otherwise be instigated where resource use and endangered species come into contiguity.

Relative to the changes between the Draft and the Final:

- 1) The addition of lynx HCP commitments on 58,000 acres of additional big game winter range: This seems to imply that all big game winter range is also habitat that needs protection for lynx as well. We don't agree with this implication.
- 2) The "cookie-cutter" requirement to retain unthinned 20% of each thinning project area in lynx habitat seems to provide no management flexibility that might otherwise be suggested or allowable based on such site specifics as size of unit, condition and attributes of surrounding area, etc.

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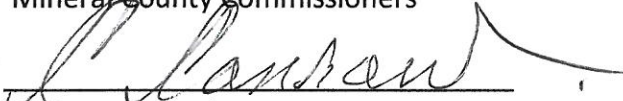
Forestry Division
Missoula

- 3) The addition of low elevation helicopter use restrictions in grizzly recovery and core areas is good – litigation over this issue would otherwise be certain.
- 4) We favor your decision to extend the riparian management zone commitment to perennial streams connected to all fish-bearing streams. However, extending the no-harvest buffer to fifty feet, though not really a significant distance is another example of “cookie-cutter” management that does not respect site-specific conditions.
- 5) The other changes and modifications that better address climate change concerns, and those that help ensure federal NEPA consistency are commendable.

Overall, we commend you for providing a plan that, for the most part, provides a reasonable balance between providing the necessary species conservation called for under the Endangered Species Act strictures, while still providing for the management flexibility needed for the DNRC to fulfill its Land Trust mandate under Montana law.

Sincerely,

Mineral County Commissioners


Clark Conrow, Chairman


B. J. McComb, Member


Duane Simons, Member